

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 05-093-JJF
)	
RYAN BACON,)	
)	
Defendant.)	

**MOTION TO ENLARGE THE TIME FOR THE FILING OF PRE-TRIAL MOTIONS
AND TO WAIVE THE APPLICATION OF THE SPEEDY TRIAL ACT**

Defendant, Ryan Bacon, by and through his undersigned counsel, Christopher S. Koyste, hereby moves the Court to issue an order that enlarges the time period for the filing of pre-trial motions to February 14, 2006 and excludes this time period from the Speedy Trial Act calculations. This additional period of time will allow the Defense sufficient time to review discovery, investigate the allegations in this action, and negotiate with the Government. Mr. Bacon submits the following in support thereof:

1. Mr. Bacon was indicted on October 25, 2005 for one count of being a Felon in Possession of a Firearm, one count of Possession with Intent to Distribute Heroin, and one count of Possession of a Firearm in Relation to a Drug Trafficking Crime. Mr. Bacon requires additional time to review discovery, investigate the allegations in this action, and negotiate with the Government. Mr. Bacon moves to enlarge the time period for the filing of pre-trial motions to February 15, 2006 and for the exclusion of this additional time period from the calculations of the Speedy Trial Act, 18 U.S.C. Section 3161(c)(1). Mr. Bacon asserts that such a time exclusion in the interests of justice.
2. AUSA Christopher Burke does not oppose this motion.

WHEREFORE, Mr. Bacon respectfully requests the Court to issue an order that enlarges the time period for the filing of pre-trial motions to February 15, 2006 and excludes this time period from the Speedy Trial Act calculations.

/s/ Christopher S. Koyste
CHRISTOPHER S. KOYSTE, ESQUIRE
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Ryan Bacon

Dated: January 24, 2006

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this Motion to Enlarge the Time for the Filing of Pre-Trial Motions and Waive the Application of the Speedy Trial Act is available for public viewing and downloading and was electronically delivered on January 24, 2006 to:

Christopher Burke, Esq.
Assistant United States Attorney
1007 Orange Street, Suite 700
Wilmington, Delaware 19801

/s/ Christopher S. Koyste
CHRISTOPHER S. KOYSTE, ESQUIRE
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Ryan Bacon